



PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS
Bob Cosentino	Cosentino Consulting Inc.	(360) 200-4959	bob@cosentinoconsulting.com
Lind Bingham	Akxo Nobel	(509) 764-1502	Lind.Bingham@akzonobel.com

INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
Patti Johnson	State	WA	pjohnson@utc.wa.gov	<input checked="" type="checkbox"/>

### Mileage Covered by Public Awareness Program (by Company and State)

Based on the most recently submitted annual report, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

#### Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

COMPANY NAME	OPERATOR ID	PRODUCT TYPE	STATE	GATHERING	TRANSMISSION	DISTRIBUTION*	REMARKS (new?)
				INTRASTATE	INTRASTATE	INTRASTATE	
AKZO NOBEL - EKA CHEMICALS, INC	32358	Hydrogen	WA	0	0.5	0	

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. \*Please do not include Service Line footage. This should only be MAINS.

Please provide a comment or explanation for inspection results for each question.

## 1. Administration and Development of Public Awareness Program

### 1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute’s (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system operators?

- Verify the operator has a written public awareness program (PAP).
- Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator’s PAP.
- Identify the location where the operator’s PAP is administered and which company personnel is designated to administer and manage the written program.
- Verify the date the public awareness program was initially developed and published.

CODE REFERENCE: § 192.616 (h); § 195.440 (h)

S - Satisfactory (explain)  
 U - Unsatisfactory (explain)  
 N/A - Not Applicable (explain)  
 N/C - Not Checked (explain)

COMMENTS:

Bullet 1: Written Program is located in Purple PAP binder

Bullet2: started 2008, no clearinghouse information

Bullet 3: Moses Lake

Bullet 4: October 10, 2008

**1.02 Management Support**

Does the operator’s program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?

- Verify the PAP includes a written statement of management support.
- Determine how management participates in the PAP.
- Verify that an individual is named and identified to administer the program with roles and responsibilities.
- Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are.
- Determine if the operator uses external support resources for any implementation or evaluation efforts.

CODE REFERENCE: § 192.616 (a); § 195.440 (a), API RP 1162 Section 2.5 and 7.1

S - Satisfactory (explain)  
 U - Unsatisfactory (explain)  
 N/A - Not Applicable (explain)  
 N/C - Not Checked (explain)

COMMENTS:

Bullet 1: letter page 7

Bullet 2: management responsibilities on page 8

Bullet 3: named in Appendix A

Bullet 4: page 17 Section X

Bullet 5: page 17 Section X

**1.03 Unique Attributes and Characteristics**

Does the operator’s program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?

- Verify the PAP includes all of the operator’s system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor stations, valves, breakout tanks, odorizers).

CODE REFERENCE: § 192.616 (b); § 195.440 (b), API RP 1162 Section 2.7 and Section 4

S - Satisfactory (explain)  
 U - Unsatisfactory (explain)  
 N/A - Not Applicable (explain)  
 N/C - Not Checked (explain)

COMMENTS:

Bullet 1: PAP refers reader to O&M, page 8

Bullet 2: PAP refers reader to O&M, page 8

**1.04 Stakeholder Audience Identification**

Does the operator's program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- Determine the process and/or data source used to identify each stakeholder audience.
- Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

Affected public

Emergency officials

Public officials

Excavators

CODE REFERENCE: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f), API RP 1162 Section 2.2 and Section 3

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

**COMMENTS:**

Bullet 1: Section V, page 9. 1320' is standard but goes beyond

Bullet 2: Section V, page 9  
only portion crosses 2 public roads. O Rd and Wheeler Rd

Bullet 3: total for each group is  
affected public - 38  
Emergency officials- 5  
public officials- 2  
excavators- 10

Note: most of effected public is on outskirts of 1320 feet. Akzo is located in all industrial area

**1.05 Message Frequency and Message Delivery**

Does the operator's program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

- Identify where in the operator's PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: (1) affected public (2) emergency officials (3) local public officials, and (4) excavators.

Affected public

Emergency officials

Public officials

Excavators

CODE REFERENCE: § 192.616 (f); § 195.440 (f), API RP 1162 Sections 3-5

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

**COMMENTS:**

Bullet 1: page 13 delivery frequency, page 14 combination of messages and page 16 delivery methods. Each page identifies all stakeholder groups

### 1.06 Written Evaluation Plan

Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.
- Verify the operator's evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).
- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences surveys and feedback.

CODE REFERENCE: § 192.616 (c),(i); § 195.440 (c),(i)

- S - Satisfactory (explain)
  - U - Unsatisfactory (explain)
  - N/A - Not Applicable (explain)
  - N/C - Not Checked (explain)

#### COMMENTS:

Bullet 1: Page 18, Section XI Program Evaluation for both annual and effectiveness evaluations

Bullet 2: Page 21, part of Program Evaluation

Bullet 3: So small, use 100% of groups. Note emergency responders are 5 and they understand

Provided copy of annual report, which is done as a 4 year only becomes a 4 year on 4th year.

## 2. Program Implementation

### 2.01 English and other Languages

Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

- Determine if the operator delivers material in languages other than English and if so, what languages.
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected.

CODE REFERENCE: § 192.616 (g); § 195.440 (g), API RP 1162 Section 2.3.1

- S - Satisfactory (explain)
  - U - Unsatisfactory (explain)
  - N/A - Not applicable (explain)
  - N/C - Not Checked (explain)

#### COMMENTS:

Bullet 1: page 6, Regulatory Compliance: Public Awareness

Bullet 2: page 6, Uses City-data.com for population and languages, etc

Bullet 3: Uses City-data.com for population and languages, etc

**2.02 Message Type and Content**

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

- Use of a one-call notification system prior to excavation and other damage prevention activities;
- Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
- Physical indications of a possible release;
- Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
- Procedures to report such an event (to the operator)?
  
- Verify all required information was delivered to each of the primary stakeholder audiences.
- Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.

- [ ] Affected public
- [ ] Emergency officials
- [ ] Public officials
- [ ] Excavators

CODE REFERENCE: § 192.616 (d), (f); § 195.440 (d), (f)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1: Page 10, VI Message Content

Bullet 2: Page 10, VI Message Content

Bullet 3: Page 10, VI Message Content

Bullet 4: Page 10, VI Message Content

Bullet 5: Page 10, VI Message Content

Bullet 6: Reviewed stamp purchase, ided for Akzo and reviewed mailing list. Also reviewed the Akzo mailing sent to Cosentino.

Bullet 7: reviewed mailing with all phone numbers for general information and emergencies

**2.03 Messages on Pipeline Facility Locations**

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

- Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

CODE REFERENCE: § 192.616 (e)(f); § 195.440 (e)(f)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1: page 9. No Schools in 1320 feet Area or any surrounding area, this is industrial areas. County Commission and City hall. Send letter to County Commission and City hall both are part and of LEPC (Local Emergency Planning Commission)

**2.04 Baseline Message Delivery Frequency**

Did the operator’s delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

- Identify message delivery (using the operator’s last five years of records) for the following stakeholder audiences:
  - Affected public
  - Emergency officials
  - Public officials
  - Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:  
 Bullet 1: Became jurisdictional in 2008, however was built in 1995. Review records. Although there are not 5 years available

**2.05 Considerations for Supplemental Program Enhancements**

Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?

- Affected public
- Emergency officials
- Public officials
- Excavators

Determine if the operator has considered and/or included other relevant factors for supplemental enhancements.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 6.2

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:  
 SECTION IX, PAGE 15,

## 2.06 Maintaining Liaison with Emergency Response Officials

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator's ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

- Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- Identify the operator's expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 4.4

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not applicable (explain)
- N/C - Not Checked (explain)

### COMMENTS:

Bullet 1: with LEPC, 1st responder hand book and American Chemical Council requires communication with all 1st responders either phone or face to face. List has overlaps with PAP 1st responder. Reviewed Health Safety Environmental and Security update for Akzo nobel plant 2011 and 2012. Akzo is chemical manufacture and has stringent public awareness requirements from chemical industry responsible care requirements. They are ISO registered.

Also, reviewed Evaluation of Stakeholder Dialog Efficiency for 2012 which is documentation of the phone or face to face communication safety .

Bullet 2: mailed 1st responder hand book to emergency groups. Akzo is chemical manufacture and has stringent public awareness requirements from chemical industry requirement. LEPC has meetings where expectations and what can be provided for others.

Bullet 3: page 9 describe expectations and LEPC for all industrial companies. Also if the pressure system goes beyond limits, compressor automatically shut down.

Bullet 4: They coordinate with members in LEPC for normal emergency response- which in this case is to isolate area for 1/2 mile or fight fire

Bullet 5: communicated through LEPC and mailings.

## 3. Program Evaluation & Continuous Improvement (Annual Implementation Audits)

### 3.01 Measuring Program Implementation

Has the operator performed an audit or review of its program implementation annually since it was developed? If not,

did the operator provide justification in its program or procedural manual?

- Verify the operator performed an annual audit or review of the PAP for each implementation year.

CODE REFERENCE: § 192.616 (c), (i); § 195.440 (c), (i), API RP 1162 Section 8.3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1: provided copy of annual PA evaluation. This evaluation is in depth and in reality is a 4 year evaluation every year.

### 3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

- Determine how the operator conducts annual audits/reviews of its PAP.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1: page 18, Section XI. Very small usually less than 4 locates requested a year and no more than 1 locate is required. In 2011 had 12 requests and no actual required locates. Akzo does keep the one public road crossing permanently marked.

### 3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?

- Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.
- If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1: page 18, Section XI

Bullet 2: NA

## 4. Program Evaluation & Continuous Improvement (Effectiveness Evaluations)

### 4.01 Evaluating Program Effectiveness

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator conducted an effectiveness evaluation of its program program (or no more than 4 years

following the effective date of program implementation).

- ☑Document when the effectiveness evaluation was completed.
- ☑Determine what method was used to perform the effectiveness evaluation (in-house, by 3rd party contractor, participation in and use the results of an industry group or trade association).
- ☑Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP1162 Section 8.4

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1: 2012 1st 4 year evaluation to be completed, however every annual report is a full 4 year evaluation. Prepared at end of year

Bullet 2: na required in 2012, is done at the end of the year

Bullet 3: all 3rd party contractor, Cosentino consulting. In house for chemical industry public awareness

Bullet 4: Akzo uses 100% of groups for size.

**4.02 Measure Program Outreach**

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- ☑Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.
- ☑Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).
- ☑Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

- [ ] Affected public
- [ ] Emergency officials
- [ ] Public officials
- [ ] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1: Most reached by LEPC, sending response card to excavators for 2012.

Bullet 2: Since small affected pulbic used LEPC which includes emergency and public officals and all industrial companies. Also chemical co communication list. Starting to use feed back cards for affected public and excavators

Bullet 3: Use 100% of groups as sample size

**4.03 Measure Percentage Stakeholders Reached**

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.
- Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.

- [ ] Affected public
- [ ] Emergency officials
- [ ] Public officials
- [ ] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:  
 Bullet 1: Use 100%,  
  
 Bullet 2:  
 AFFECTED PULBIC - Return Card  
 EMERGENCY OFFICIALS - LEPC  
 PUBLIC OFFICIALS - LEPC  
 EXCAVATGORS - Return Card

**4.04 Measure Understandability of Message Content**

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual? (Reference: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2)

- Examine the operator’s evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.
- Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.
- Determine if the operator pre-tests materials.

- [ ] Affected public
- [ ] Emergency officials
- [ ] Public officials
- [ ] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:  
 Bullet 1: 4 year will be completed in 2012  
  
 Bullet 2: Will be completed at end of 2012 for for 2012 evaluation  
  
 Bullet 3: no pre tested material used

**4.05 Measure Desired Stakeholder Behavior**

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

- ☑Examine the operator’s evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- ☑Verify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

- [ ] Affected public
- [ ] Emergency officials
- [ ] Public officials
- [ ] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:  
 Bullet 1: Based on locates, Alko feels is effective. No damages etc. Intended behaviors learned  
  
 Bullet 2: Based on locates, Akzo feels is effective. No damages etc. Intended behaviors learned

**4.06 Measure Bottom-Line Results**

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

- ☑Examine the operator’s process for measuring bottom-line results of its program.
- ☑Verify the operator measured bottom-line results by tracking third-party incidents and consequences.
- ☑Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public’s perception of the safety of the operator’s pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.4

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:  
 Bullet 1: page 20, Seciton Bottom Line Results  
  
 Bullet 2: No damages, etc, measured bottom line results  
  
 Bullet 3: Use LEPC for perception and page 20 for bottom line results. No residences on Akzo pipeline. All others in affected pulbic are within the 1320 footage and ALL others are industrial users.

**4.07 Program Changes**

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

- ☑Examine the operator's program effectiveness evaluation findings.
- ☑Identify if the operator has a plan or procedure that outlines what changes were made.
- ☑Verify the operator identified and/or implemented improvements based on assessments and findings.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 2.7 Step 12 and 8.5

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

**COMMENTS:**

Bullet 1: 2012 Is 4th year. First formal 4 year evaluation will be completed at the end of this year. However all annuals have detail for 4 year.

Bullet 2: No changes to plan have been made. LEPC documentation will be added

Bullet 3: No improvements.

**5. Inspection****SUMMARY:**

Akzo is very small and affected Public feed back from is difficult.

**FINDINGS:**